

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SELMA DIVISION**

JUDSON COLLEGE; JOAN VIGNES)
NEWMAN; JUDITH KAREN FAVOR;)
DAPHNE RUDICELL ROBINSON; and)
JOSEPH WILLIAM "BILL" MATHEWS,)
JR.,)

Plaintiffs,)

v.)

INDIAN HARBOR INSURANCE CO.,)
KEN GOFORTH; and USI INSURANCE)
SERVICES,)

Defendants.)
_____)

DECLARATION OF THOMAS M. CONTOIS

Thomas M. Contois declares as follows:

1. I am a partner in the law firm of Phelps Dunbar LLP, resident in the firm's office in Raleigh, North Carolina. I am one of the lawyers representing Indian Harbor Insurance Company with respect to the lawsuit brought against it by Judson College and certain of its trustees and officers.
2. I am over the age of 18, and have personal knowledge of the facts set forth in this declaration.
3. On August 9, 2023, I spoke by telephone with Richard Smith, counsel for Judson College and the individual plaintiffs. In the course of our conversation, Mr. Smith indicated that, among the relief sought from Indian Harbor by the plaintiffs were the legal fees and expenses they had

incurred in defending against the underlying action, which he estimated to be approximately \$250,000.00.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 21, 2023.


Thomas M. Contois